

**THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Douglas Johnson,)	
)	
Plaintiff)	
)	
v.)	Case No. 2022 cv 3718
)	
COOK COUNTY SHERIFF THOMAS)	Judge Robert W. Gettleman
DART , in his official capacity)	
ANTWAUN BACON, a CCDOC officer,)	
and COOK COUNTY, a municipal)	
corporation)	
)	
Defendants.)	

DEFENDANT OFFICER BACON’S MOTION TO FILE EXHIBITS UNDER SEAL

Defendant, OFFICER ANTWAUN BACON, by and through her Special Assistant State’s Attorneys, Jason E. DeVore and Jorie R. Johnson of DEVORE RADUNSKY LLC, and in support of his Motion for Summary Judgment, asks this Court to accept the filing of exhibit under seal pursuant to Local Rule 26.2(c). In support thereof, Defendant state as follows:

1. On June 13, 2025, Defendant filed his Motion for Summary Judgment, including his Rule 56.1(a)(2) Statement of Facts material facts and exhibits in support of his Motion for Summary Judgement.
2. Exhibit No. 7 to Defendant’s Statement of Facts are the Plaintiff Douglas Johnson’s medical records from Cook County under booking 20190508253
3. A provisional exhibit, without the record attached has been filed as Dkt. 85-7 (“Exhibit No. 7”).
4. Out of an abundance of caution, Defendant subsequently filed the Medical Records separately, under seal, as Dkt. 87.
5. Defendant asks the Court to accept the filing under seal and link or substitute Dkt. 87 for the provisional exhibit Dkt.85 -7 (Exhibit No. 7).

6. Should the Court determine that the document need not be filed under seal, Defendants requests to substitute the unsealed documents filed under Dkt. 87 for the provisional exhibits Dkt. 85-7 (Exhibit No. 7.)

WHEREFORE, Defendant OFFICER ANTWAUN BACON requests that this Honorable Court link or substitute the document filed under as Dkt 87. with the entry in place of Dkt. 85-7 (Exhibit No. 7) sealed or unsealed, and any other relief this Court deems just and proper.

Respectfully submitted,

EILEEN O'NEILL BURKE
State's Attorney of Cook County

By: /s/ Jason E. DeVore
Jason E. DeVore
One of the Attorneys
for **Defendant Officer Bacon**

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CERTIFICATE OF SERVICE

I, Jorie R. Johnson, hereby certify that I have caused true and correct copies of the above and foregoing to be served on Plaintiff's counsel of record pursuant to ECF, in accordance with the rules of electronic filing of documents on this 12th day of June 2025.

/s/ Jorie R. Johnson
Jorie R. Johnson